



Fw: 7 Cedars Casino Nitrate sampling

Lisa Jacobsen to: rsather

Bcc: Lisa Jacobsen

10/25/2012 11:09 AM

From: Lisa Jacobsen/R10/USEPA/US

To: rsather@7cedarscasino.com

Bcc: Lisa Jacobsen/R10/USEPA/US

Hi Ron,

The results for your last four quarterly nitrate samples have been above 50% of the MCL, 10mg/L. As long as they continue to be above 50% of the MCL you will need to continue taking quarterly samples to monitor nitrate levels in your drinking water. This monitoring is to assure that the level does not reach 10 mg/L.

You should have taken a sample during the time period of July 1 through September 30, 2012, but there may have been some confusion from the email I sent to you last year (see below) since I gave you a schedule for monitoring assuming that the future samples would be below 5 mg/L, but they are not. The results for the last 4 quarters are:

August 17, 2012	9.08 mg/L
December 7, 2011	7.62 mg/L
March 12, 2012	6.41 mg/L
June 5, 2012	5.15 mg/L.

If you did sample last quarter please send the results to me as soon as you can. If a sample was not taken, then please take one as soon as you can and continue to take quarterly nitrate samples until further notice, you will need four consecutive quarters below 50% of the MCL of 10 mg/L before you can go back to annual monitoring.

If you have any questions about this change in frequency of monitoring for nitrates please contact me.

Thanks,

Lisa (206) 553-6917

Lisa Jacobsen

Tribal Drinking Water Coordinator

EPA R10

1200 6th Ave, Suite 900, m/s OWW-136

Seattle, Washington 98101

(206) 553-6917

— Forwarded by Lisa Jacobsen/R10/USEPA/US on 10/25/2012 10:50 AM —

From: Lisa Jacobsen/R10/USEPA/US

To: rsather@7cedarscasino.com

Date: 08/08/2011 02:05 PM

Subject: 7 Cedars Casino Nitrate sampling

Hi Ron,

I have reviewed your data for nitrates and a couple of your samples were high. I have determined, based on the chemical rule for inorganic contaminants that you will need to change the frequency of monitoring for nitrates to quarterly.

The rule states: The maximum contaminant level for nitrates is 10 mg/L, however the frequency for any water system shall be quarterly for at least one year following any one sample in which the concentration is equal to or greater than 5 mg/L (50% of the MCL)

Your last two samples were greater than 50% of the MCL, November 17, 2010 it was 5.39 mg/L and on June 13, 2011 it was 5.44 mg/L.

The following is your monitoring schedule for the next year
You will need to collect a sample before September 30, 2011,
Collect one sample between each of the following dates:
October 1, 2011 and December 31, 2011
January 1, 2012 and March 31, 2012
April 1, 2012 and June 30, 2012

If you have any questions about this change in frequency of monitoring for nitrates please contact me.

Thanks,

Lisa (206) 553-6917

Lisa Jacobsen
Tribal Drinking Water Coordinator
EPA R10
1200 6th Ave, Suite 900, m/s OWW-136
Seattle, Washington 98101
(206) 553-6917

7 Cedars Casino Nitrate sampling

Lisa Jacobsen to: rsather

Bcc: Lisa Jacobsen

08/08/2011 02:05 PM

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Lisa (206) 553-6917

Lisa Jacobsen
Tribal Drinking Water Coordinator
EPA R10
1200 6th Ave, Suite 900, m/s OWW-136
Seattle, Washington 98101
(206) 553-6917

#105300108



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

December 22, 2010

Reply To: OWW-136

Ron Sather
Jamestown S'klallam Tribe
270756 Highway 101
Sequim, Washington 98382

RE: **OCTOBER FAILURE TO REPORT ENOUGH TOTAL COLIFORM
SAMPLES, 7 CEDARS CASINO, PWSID# 105300108**

Dear Mr. Sather:

EPA has not received all of your total coliform sampling reports for October. Bacterial contamination can cause illness or death, particularly in children and the elderly. The 7 Cedars Casino water system is required to collect two samples each month; five samples are required the month after a coliform positive sample. The number of samples is based on the system's population of 1200.

Results must be reported to EPA by the tenth day of the following month. Failure to monitor and report is a violation of the National Primary Drinking Water Standards. EPA knows that sometimes errors occur and a sample result doesn't get credited to a system. In that case, please send me a copy of the lab slip for your sample that was collected in October and we can return you to compliance. To return to compliance you must **either**:

1. Submit results for samples that you collected during October,
- or
1. Collect and report all future samples on time,
2. Monitor and report chlorine residual with each coliform sample if you chlorinate,
3. Notify your customers of this violation within one year (consumer confidence reports count as notice).

A system will become a significant non-complier if it has four or more violations within a 12-month period. This may result in an enforcement action, the requirement for a certified operator (if you don't have one), and denial of a grant or loan.

You can contact me by phone (206) 553-6917 or fax (206) 553-0165 or by email Jacobsen.lisa@epa.gov if you need assistance.

Sincerely,

Lisa Jacobsen
Tribal Drinking Water Coordinator

cc. Tom Moeller, Indian Health Service

UPDATE on Seven Cedars Casino

12/15/2010

Seven Cedars no longer uses Ozone. They are now using sodium hyperchlorite

#105300108

Dale Becker/R10/USEPA/US
06/12/2009 11:44 AM

To "Ron Sather" <rsather@7cedarsresort.com>, "Jeff Becker" <jbecker@jamestowntribe.org>, "Christopher Lee" <clee@bluelinewater.com>
cc Lisa Jacobsen/R10/USEPA/US@EPA, Tom.moeller@ihs.gov
bcc Dale Becker/R10/USEPA/US

Subject 7 Cedars Casino Proposed Source and Treatment Changes

Thank you for waiting patiently for me to provide my input on your proposed source and treatment changes. I have attached 2 documents described below:

7 Cedars Monitoring After Source Changes.doc - This shows your current sampling schedules and the sampling required under each of the proposed changes. I also summarized the changes, so let me know if I misunderstood any of the proposals.

NTNC_GW.doc - A list of monitoring requirements for new sources. This list includes the path to reduced monitoring and regulatory references which I did not include in the other document.

I cannot speak to the effectiveness of the proposed treatment without design specifics and water quality data but oxidation and filtration is a standard treatment for all metals so the proposed solutions should work.

Option 1: Use old well with upgraded treatment

Pros: This option saves you the money of initial SOC and VOC sampling

Cons: You will no longer have any disinfectant, the loss of disinfectant increases the risk of illness if source contamination occurs. The source is highly vulnerable so source contamination is possible, under the groundwater rule you may be required to upgrade or replace the source. This source has a lower capacity than well #2, capacity may be an issue.

Option 2: PREFERRED OPTION - Treat Well #2 with Chlorine and Filtration

Pros: Provides source and distribution disinfection, decreased source vulnerability, increased capacity. Depending on contact time and chlorine monitoring frequency you may be able to avoid triggered source monitoring under the groundwater rule.

Cons: slightly higher monitoring costs compared to Option 3 (DBP monitoring)

Option 3: Treat Well #3 with dissolved oxygen and filtration

Pros: Decreased source vulnerability, increased source capacity

Cons: Loss of disinfection, causing increased health risk.

Conclusions:

I would recommend option #2 because it provides the greatest health benefit (and liability reduction) while improving capacity. The increased monitoring cost (when compared with option 3) may be balanced in the future by reduced triggered monitoring under the groundwater rule.

Please send me design details and implementation schedule before installing the treatment. This will help us be sure that your monitoring schedule is correct. Since EPA does not have engineering standard for utilities I strongly encourage you to provide engineering documents to Tom Moeller at Indian Health Service. He can provide free engineering review that may save you time and money in the future.

#105300108

I also suggest that you collect a full set of SOC's, VOC's, IOC's, and water quality parameters (pH, alkalinity, hardness) before completing the design work.



7 Cedars Monitoring After Source Changes.doc NTNC_GW.doc

Dale Becker
Environmental Scientist
Drinking Water Unit
EPA Region 10, Office of Water
1200 Sixth Ave, Suite 900 (OWW-136)
Seattle, WA 98101
(206) 553-6235
Fax: (206) 553-1280

**Proposed Source and Treatment Changes
Monitoring Requirements
7 Cedars Casino**

	Current Condition	Proposal #1	Proposal #2	Proposal #3
Description	Well #1 in use, highly vulnerable location, low capacity, treated for Iron/Manganese using ozone oxidation & filter but filter plugs. Well #2 Inactive	Well #1 treatment system repair and ozone replaced with oxygen generation system (assume no ozone). Well #2 Inactive	Well #1 Emergency Use only. Well #2 active and treated for manganese. Treatment using chlorine (sodium hypochlorite) with filtration.	Well #1 Emergency Use only. Well #2 active and treated for manganese. Treatment using dissolved oxygen generator with no disinfectant.
IOC	Every 3 years	Every 3 years	Sample in the first year then every 3 years	Sample in the first year then every 3 years
SOC	Every 3 years	Every 3 years	Quarterly for 4 quarters	Quarterly for 4 quarters
VOC	Every 3 years	Every 3 years	Quarterly for 4 quarters	Quarterly for 4 quarters
Nitrate	Every Year	Every Year	Nitrite and Nitrate in first quarter on-line, then annual Nitrate and 3 year Nitrite (assuming the concentration is < ½ MCL	Nitrite and Nitrate in first quarter on-line, then annual Nitrate and 3 year Nitrite (assuming the concentration is < ½ MCL
Lead & Copper	20 every 6 months	20 every 6 months	20 every 6 months	20 every 6 months
DBPs (TTHM & HAA5)	Every Year	NA	Every Year	NA
Bromate	1 Each Month at entry point	NA	NA	NA
Chlorine	NA	NA	At the same time and place as Total Coliform samples	NA
RADs	NA	NA	NA	NA

***New Non-Transient Non-Community (NTNC) Groundwater Water system
Monitoring Requirements
< 500***

***Entry Point Monitoring
(after treatment but before the first customer)***

IOCs

1. **Asbestos:** depends on vulnerability
 - a. Are AC pipes present in the distribution system?
 - b. If no AC Pipe then:
 - i. One entry point sample before the end of first calendar year in service and once every 3 years if < MCL (40CFR141.(b)(1))
 1. If > MCL quarterly
 - c. If yes to AC pipe then (both)
 - i. One entry point sample before the end of first calendar year in service and once every 3 years if < MCL (40CFR141.(b)(1))
 1. If > MCL quarterly
 - ii. One tap sample before the end of first calendar year in service and once every 3 years if < MCL (40CFR141.(b)(5))
 1. If > MCL quarterly
2. **Standard IOCs** (antimony, arsenic, barium, beryllium, cadmium, chromium, cyanide, fluoride, mercury, nickel, selenium, and thallium)
 - a. Once every 3 years for initial period unless more frequent sampling is specified by Regional Office (40CFR141.23(c)(9))
 - b. Quarterly if > MCL
3. **Nitrate**
 - a. Annual, first sample in the first quarter in service (40CFR141.23(d))
 - b. If > 1/2 MCL then quarterly (40CFR141.23(d))
4. **Nitrite**
 - a. One sample before end of first calendar year in service (40CFR141.23(e)(1))
 - b. If initial sample < 1/2 MCL monitor at frequency specified by regional EPA office (40CFR141.23(e)(2))
 - c. If initial sample > 1/2 MCL quarterly for at least one year (40CFR141.23(e)(3))

VOCs

1. Initial quarterly (40CFR141.24(f)(4))

2. If initial is all below detect then annual for at least three years (40CFR141.24(f)(5))
3. If annual samples are below detect for 3 years in a row then reduce to once every 3 years (40CFR141.24(f)(6))

SOCs

1. Initial quarterly (40CFR141.24(h)(4i))
2. If initial samples are below reduce to once every 3 years (40CFR141.24(h)(4iii))

Distribution System Monitoring ***(check guidance for how to choose sites)***

Disinfection By-Products (DBPs) – if a chemical (ozone or chlorine) disinfectant is used

1. One sample per year, in summer months at maximum residence time site (40CFR141.132(b)(1i))

Lead & Copper

1. Collect Five Tap samples, or more if population > 99 (40CFR141.86(c))
2. Every Six months for at least once year ((40CFR141.86(d)(1))
 - a. If 2 rounds of sampling are < Action Level (AL) then reduce to once every 3 years ((40CFR141.86(d)(4i))
 - b. After 3 years of annual sampling < AL reduce to once every three years in summer months ((40CFR141.86(d)(4iii))

Total Coliform/Chlorine

1. One total coliform sample per month
2. Chlorine residual (free chlorine is acceptable) analyzed at time and place where total coliform was collected and reported with total coliform results



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

June 29, 2007

Reply to
Attn Of: OWW-136

Ron Sather
Jamestown S'Klallam Tribe
Seven Cedars Casino - ID# 105300108
270756 Hwy 101
Sequim, WA 98382

**RE: EPA Monitoring Data for Tribal Drinking Water Systems
3rd Quarter - Related to Summer Months 2007**

Dear Mr. Sather:

Once again we are sending you a copy of the monitoring log for your system or systems. We ask that you review the accuracy of this monitoring information. If your records do not agree with ours, please contact us as soon as possible. If your monitoring log shows that your water system is due or past due for specific monitoring, please make arrangements to provide your monitoring results as soon as possible. (See the enclosed sheet called "How to Read Your Monitoring Log").

Also, please find listed below several important issues related to drinking water monitoring during the summer months and a reminder on how to submit your laboratory analyses to our office.

- Lead and copper samples taken in summer: We would like to remind those of you that are on reduced monitoring for lead and copper that your lead and copper sampling must take place in June, July, August or September. (If you are not on reduced lead and copper monitoring, you must conduct lead and copper monitoring every six months.) Please check your monitoring log to see if you need to sample this year or not. (The year is indicated under the column for "Next Sample Due Date"). There are also specifications about the location from where the water samples are taken. Please refer to your system's Water Quality Monitoring Plan or contact us for more details.
- New requirements about submitting electronic laboratory results: Starting October 1, 2007, we will need everyone to submit hard copies of their laboratory results. What this means is that, if you are currently sending to EPA solely an email of your results --- that is not enough. You will need to send a hard copy by fax machine or U.S. postal mail in addition to, or in place of the email version.

- Laboratory results that you send need to be readable: Please remember to review your lab reports for readability and accuracy before submitting them to EPA. We ask that you follow our guidelines for how to submit your lab slips and reports. For details, note a list at the bottom of the enclosed sheet "Guidelines for Submitting Laboratory Reports to EPA". Please continue to submit all lab reports to Jim Harnett's attention at the following address:

James Harnett
U.S. EPA Region 10
1200 6th Avenue OWW-136
Seattle, Washington 98101
FAX 206-553-0165

If you have questions, please contact Jim Harnett or Lisa Jacobsen. Jim Harnett can be reached at 206-553-4044 or send email to harnett.james@epa.gov. Lisa Jacobsen can be reached at 206-553-6917 or jacobsen.lisa@epa.gov. You can also call me at 206-553-1893 with other questions.

Sincerely,



Marie Jennings
Manager, Drinking Water Unit

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 11, 2007

Reply to
Attn Of: OWW-136

Ron Sather
Jamestown S'Klallam Tribe
270756 Hwy 101
Sequim, WA 98382

Re: Vulnerability Analysis to Determine If Ground Water Is Influenced By
Surface Water

Dear Mr. Sather :

EPA is pleased to announce that all tribal drinking water systems no longer need to do monthly monitoring of RAW WATER for total coliform bacteria. As you may remember some time ago, EPA required water systems to collect water samples from RAW water to monitor for total coliform bacteria. This data was used to make a determination as to whether or not your ground water was influenced by surface water. The Ground Water Rule refers to this vulnerability as ground water under direct influence (GUDI or GWUDI).

EPA has received all of the data that we need to make determinations, so there is no longer a need for you to continue to monitor your RAW water for total coliform bacteria.

This discontinuation of monitoring should not be confused with the ongoing monthly monitoring of your FINISHED WATER for total coliform. **You must continue to monitor your FINISHED WATER for total coliform.** If you have any questions about this discontinued monitoring please do not hesitate to call Lisa Jacobsen of my staff at (206) 553-6917.

Sincerely,

Marie Jennings
Manager, Drinking Water Unit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: OWW-136

CERTIFIED MAIL-
RETURN RECEIPT REQUESTED

DRAFT

Ron Sather
Facilities Manager
7 Cedars Casino
Jamestown S'Klallam Indian Tribe
270756 Hwy. 101
Sequim, WA 98382

Re: Request for Information
(7 Cedars Casino Water System, EPA #105300108)

Dear Mr. Sather:

The following REQUEST FOR INFORMATION is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") by Section 1445(a) of the Safe Drinking Water Act, 42 U.S.C. §300j-4(a). This authority has been delegated to the Regional Administrator, Region 10, and has been duly redelegated to the undersigned Director, Office of Water and Watersheds, Region 10.

There is some confusion regarding the water user population, including regular staff employees and average daily customers that have access to this drinking water system. To date you have not responded to informal requests for responses to this question. There have been several new drinking water rules developed under the SDWA that bear upon your response and may require significant changes to your required monitoring and reporting requirements.

You are requested to provide a separate written answer to each and every part of a question set forth in this REQUEST FOR INFORMATION. Incomplete, evasive or ambiguous answers shall constitute a failure to respond and may subject you to the sanctions described below:

Question No. 1: How many regular staff are employed either full time or part time at the Casino?

Question No. 2:

On average, how many customers visit the Casino each day?

If the combined populations reach 25 persons, which I believe will be the case, this water system will be reclassified as a non-transient non-community public water system and the monitoring requirements will be changed accordingly.

Respondent's response to this REQUEST FOR INFORMATION should be mailed within 15 days of receipt to:

U.S. Environmental Protection Agency
Attn: Craig L. Paulsen
Drinking Water Unit
1200 Sixth Ave., Mail Stop OWW-136
Seattle, WA 98101

The information requested herein must be provided even if Respondent contend that it includes confidential business information or trade secrets. In accordance with 40 CFR §2.203(a), Respondent is hereby notified as follows:

- a. Respondent may assert a business confidentiality claim covering part, or all of the information requested above in the manner described by 40 CFR §2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 CFR Part 2, Subpart B.
- b. If no such claims accompany the information when it is received by EPA, the information may, without further notice to the Respondent, be made available to the public.
- c. EPA's Regulations covering this subject appear in 40 CFR Part 2, Subpart B, and 41 Fed. Reg. 36902 through 36924 (September 1, 1976) as amended.

This REQUEST FOR INFORMATION shall become effective upon the date of receipt by the Respondent.

Compliance with the foregoing REQUEST FOR INFORMATION is required by law. A failure to provide complete, truthful responses within 15 days of receipt of the foregoing REQUEST FOR INFORMATION may subject the Respondent to civil penalties of up to \$25,000 pursuant to Section 1445(c) of the SDWA, 42 U.S.C. §300j-4(c). Responses that are incomplete, ambiguous, or evasive may be treated as non-compliance with this request.

The provision of false, fictitious, or fraudulent statements, or representations in response to this REQUEST FOR INFORMATION, may subject the provider of such statements to criminal penalties pursuant to 18 U.S.C. §1001.

Issuance of this REQUEST FOR INFORMATION does not preclude

the pursuit of additional enforcement action in response to violations of the SDWA, including, but not limited to administrative penalty orders, or civil, or criminal judicial actions. If further administrative or judicial proceedings are initiated against you, you may be subject to additional monetary fines or penalties.

Sincerely,

Michael F. Gearheard
Director
Office of Water and Watersheds

cc: William Ron Allen, Jamestown S'Klallam Tribe
Annette Nesse, Jamestown S'Klallam Tribe
Vickie Carroll, Jamestown S'Klallam Tribe
Shannon Cooper, EPA Compliance Officer
Bob Hartman, EPA ORC
Marie Jennings, EPA Drinking Water Unit Manager
Craig Paulsen, EPA Tribal Drinking Water Coordinator



Craig
Paulsen/R10/USEPA/US
03/20/2006 08:34 AM

To Ron Sather <rsather@7cedarscasino.com>
cc Vickie Carroll, Skeet Arasmith,
bcc
Subject RE: 7 Cedars Casino water user population

Hi, Ron. Thanks for your phone message and for your emailed response below. I think you're right, we both had the information going out, but were not connecting the dots.

Anyway, with your response of 200 employees and about 1,000 customers per day, the new drinking water monitoring requirements- due to several new drinking water rules that don't allow me to continue to treat this as a transient water system- will be:

total coliform bacteria- 2 tap samples each month per an approved sampling plan
inorganic chemicals (except arsenic and nitrate)- source sample, once every 3 years (past due)
arsenic- not due until 12/31/10
nitrate- source sample, due annually, (past due)
lead/copper- 10 tap samples every 3 years, per an approved sampling plan, (past due)
organic chemicals (SOCs/VOCs)- source sample (past due)
bromate- monthly, post-ozone treatment, (past due)

Yet another new rule, the Ground Water Rule, is anticipated this year and will require me to evaluate all wells for possible surface influence. I checked your well log for indications of possible surface influence and found "mixed" signals. The shallow depth is of concern, but the soils were fairly reassuring. When the new rule becomes final and I know what the specific requirements will be I'll get back in touch with you to see if anything further in the way of testing or treatment might be required. At this point in time I suggest that we both just wait to see what the final language turns out to be and go from there- I won't be needlessly adding more to your plate than I am forced to do.

EPA is in the process of bringing a new tribal water quality tracking database on line. You will soon receive an information letter with a copy of a database report that summarizes our understanding of your monitoring and reporting status (should be very similar to the info above). My plan is to send these informal letters out every 3 months in an attempt to stay on the same page with you and the other water system owners/operators.

In the meantime, thanks again for your response to the population question. I ask that you either send me missing lab reports or arrange to have these tests done as needed as soon as possible. Please advise what your monitoring status is and how you wish to get back on the same page with me.


Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit (OW-136)
EPA Region 10
Tel: 206-553-4350
Cell: 206-601-8632
Fax: 206-553-0165
Ron Sather <rsather@7cedarscasino.com>



Ron Sather
<rsather@7cedarscasino.com>
03/17/2006 07:16 AM

To Craig Paulsen/R10/USEPA/US@EPA,
vcarrol@jamestowntribe.org
cc
Subject RE: 7 Cedars Casino water user population

#105300108



Hi Craig, I want to apologize on not getting you the answers you needed. I'm not sure where it fell through the cracks but apparently it has. The casino employs 200 plus people and our visitor count is probably averages about 1000 per day. We discussed all of this with Frank f/ACR on two occasions and I assumed you were getting that information from him as well. We certainly want to comply with all regulations and any responsibilities we have as far as water monitoring, and will take whatever steps necessary to do so. If there is anything else you need from me please let me know, Ron

-----Original Message-----

From: Paulsen.Craig@epamail.epa.gov
[mailto:Paulsen.Craig@epamail.epa.gov]
Sent: Thursday, March 16, 2006 1:35 PM
To: rsather@7cedarscasino.com
Cc: vcarroll@jamestowntribe.org; skeet@acrp.com
Subject: 7 Cedars Casino water user population

Hi, Ron. Vickie was kind enough to forward your email address to me which allows me to forward to you a draft and unsigned Information Request for you to respond to the above question. This is very important and I've had difficulty getting even mixed responses. I ask you to review the attached draft document and respond via email so that I can avoid taking this step.

Essentially, if your response is 25 or more persons, then I will have to reclassify the Casino as a non-transient non-community water system. Several new drinking water rules require this re-evaluation and it may well change your required monitoring and reporting requirements. Also, the number you give me will determine how many samples would be required if a reclassification is required.

I would appreciate your prompt attention to this request so we can avoid finalizing the document, something that none of us wants to see. Thanks much for your cooperation here.

(See attached file: 06 Information Request.DOC)

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit (OW-136)
EPA Region 10
Tel: 206-553-4350
Cell: 206-601-8632
Fax: 206-553-0165



Craig
Paulsen/R10/USEPA/US
01/18/2006 02:57 PM

To vcarroll@jamestowntribe.org
cc
bcc

Subject 7 Cedars monitoring requirements

Vickie, I received your phone message regarding questions about who has to do what kind of monitoring for the 7 Cedars Casino drinking water system. I'm responding via email because my response is pretty complex and I want to make sure it all gets to you folks. This message should go to Ron Sather as well but I don't have his email address- could you please let me know if he has an email address and also go ahead and forward this message to him for his own information. Up to now I've accepted the initial state determination which is that the Casino is essentially a transient water system. While I was a little uncomfortable with this I went along with it at the time. Since that time, however, the drinking water rules and how EPA is required to report back to Congress has changed, really tightening up in the process. This trickles down to state drinking water programs as well.

This big \$64 question now is: does the Casino employ at least 25 staff that work regularly- not necessarily daily, but regularly?

If the answer is yes, and I doubt that it could be anything else in all honesty, then the 7 Cedars Casino should be reclassified as a non-transient non-community public water system. This type of system (NTNC) has the same sampling and reporting requirements as a community water system except that the radionuclide rule does not apply to a NTNC.

If the Casino is a NTNC water system, it currently should be monitoring as follows:

- total coliform bacteria- monthly (per approved sampling plan)
- nitrate- annual
- arsenic- every 3 years beginning 12/31/07
- other inorganic chemicals- every 3 years
- lead/copper- at least 5 tap samples every 3 years (per approved sampling plan)
- VOCs/SOCs- every 3 years

if disinfectant is used, then TTHMs and HAA5s - one sample each August

when the Ground Water Rule is passed- then any "vulnerable" water source, OR any water system that disinfects- this would include the ozone treatment now being done by the Casino- is required to use chlorine to maintain a chlorine residual in the water at all time. In other words, if the Casino uses ozone, it will still also have to chlorinate. And, when the Ground Water Rule passes, daily chlorine residual monitoring (and reporting) will be required.

As I discussed on the phone with you, my hope is that I will be allowed to review the monthly chlorine residual monitoring log, to be submitted along with the monthly bacti sample, and make a value judgement as to whether or not the system made a good faith effort to monitor chlorine residual every day (or close to it) and were able to keep the chlorine residual constant in the distribution system.

The long and short of all this is that I believe that the Casino will soon be reclassified as an NTNC and will be required to monitor as you do. And since the Casino operates daily I doubt they will be able to work a reduced or seasonal effort like we're trying to do for the River Center system. EPA cannot make the decision as to who must do what sampling- this is an internal decision for the Tribe and the Casino to work out. We're legally bound to work with the owner of the systems. For tribal enterprises, such as the 7 Cedars Casino, EPA would attempt to work with the enterprise authority- I assume Ron Sather in this instance. If that fails, then EPA is required to go to the Tribal Council to ensure that the water systems are monitoring and reporting as required. I'm sure this is not what you or Ron were hoping to hear, but I don't have much choice in the matter anymore. The rules have become much more clear in the past few years

#105300108

and EPA's focus on monitoring and reporting is much greater than ever before. I hope this helps.

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit (OW-136)
EPA Region 10
Tel: 206-553-4350
Cell: 206-601-8632
Fax: 206-553-0165



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

March 3, 2004

Reply To
Attn Of: OW-136

Ron Sather
Facilities Manager
7 Cedars Casino
270756 Hwy 101
Sequim, WA 98382

RE: 7 Cedars Casino Drinking Water System

Dear Mr. Sather:

This letter is an INFORMAL ADVISORY to you on the current monitoring status of your public water system(s) according to EPA's monitoring records. If EPA's records are incorrect, this is your opportunity to help me correct them. If EPA's records show that your system is due for required monitoring, please arrange to have this done in order to avoid formal EPA actions.

JUST A REMINDER-IF YOU DID NOT SAMPLE FOR RADIUM-228 BY DECEMBER 8, 2003, THE FIRST QUARTERLY SAMPLE MUST BE COLLECTED BY MARCH 31.

The Safe Drinking Water Act requires public water systems to monitor and report on regulated drinking water contaminants in their system (40 CFR Part 141). Sample results are due to EPA by the 10th day of the month following the monitoring period (40 CFR Part 141.31). Please mail, fax or email these results to EPA promptly in order to ensure that your monitoring efforts are properly credited to your water system(s). Test results should be sent to:

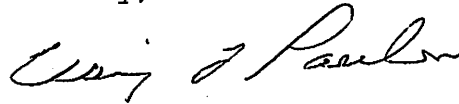
Craig L. Paulsen
Drinking Water Unit (OW-136)
EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Tel: (206) 553-4350
Fax: (206) 553-0165
Email: paulsen.craig@epa.gov

If you are currently under an EPA enforcement action, you must fulfill the requirements of that action in addition to

providing me with your routine monitoring results..

Sincerely,

A handwritten signature in cursive script, appearing to read "Craig L. Paulsen".

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit

Enclosure: EPA Monitoring Log

WATER SYSTEM: 7 Cedars Casino, EPA ID#105300108

TRIBE: Jamestown SKlallam Tribe

<u>Regulated Contaminant Group</u>	<u>Routine Sampling Schedule</u>	<u>Date of Last Sample</u>	<u>Next Sample Due Date</u>	<u>Violations Recorded</u>	<u>Comments</u>
Coliform Bacteria	Quarterly	01/15/04	04/30/04		
Inorganic Chemicals (IOCs, except nitrate)	Not applicable				Not applicable
Nitrate	Annual	11/05/03	11/30/04		
Organic Compounds (VOCs/SOCs)	Not applicable				Not applicable
Lead/Copper (tap)	Not applicable				Not applicable
Gross Alpha Screen	Not applicable				Not applicable
Radium-228	Not applicable				
Sanitary Survey	every 5 years				
Consumer Confidence Report	Not applicable				Not applicable
Surface Water Treatment Rule Requirements	not applicable	not applicable	not applicable	Not applicable	Not applicable
Monitoring Waiver in effect:		Asbestos/Dioxin			

Note- 10/22/01 inventoried by EPA this date, talked to Ron Sather about monitoring, will meet with him in November to do sanitary survey and clarify monitoring. Meanwhile, told Ron to continue sampling as he has under WADOH to date.

Note- per Robin Dalton 12/19/01 limited distribution system here does not justify development of full sampling plan. I will include sampling plan with sanitary survey in early 2002.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

August 8, 2003

Reply To
Attn Of: OW-136

Ron Sather
Facilities Manager
7 Cedars Casino
270756 Hwy. 101
Sequim, WA 98382

Dear Mr. Sather:

This letter is an INFORMAL ADVISORY to you on the current monitoring status of your public water system(s) according to EPA's monitoring records. If EPA's records are incorrect, this is your opportunity to help me correct them. If EPA's records show that your system is due for required monitoring, please arrange to have this done in order to avoid formal EPA actions.

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Craig L. Paulsen
Drinking Water Unit (OW-136)
EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Tel: (206) 553-4350
Fax: (206) 553-0165
Email: paulsen.craig@epa.gov

If you are currently under an EPA enforcement action, you must fulfill the requirements of that action in addition to providing me with your routine monitoring results.

Sincerely,

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit

Enclosure: EPA Monitoring Log

#105300108

Drinking Water Monitoring Log

08/15/03

WATER SYSTEM: 7 Cedars Casino, EPA ID#105300108

TRIBE: Jamestown SKlallam Tribe

<u>Regulated Contaminant Group</u>	<u>Routine Sampling Schedule</u>	<u>Date of Last Sample</u>	<u>Next Sample Due Date</u>	<u>Violations Recorded</u>	<u>Comments</u>
Coliform Bacteria	Quarterly	07/18/03	08/31/03		
Inorganic Chemicals (IOCs, except nitrate)	Not applicable				Not applicable
Nitrate	Annual	10/24/02	10/31/03		
Organic Compounds (VOCs/SOCs)	Not applicable				Not applicable
Lead/Copper (tap)	Not applicable				Not applicable
Radiologicals	Not applicable				Not applicable
Sanitary Survey	every 5 years				Not applicable
Consumer Confidence Report	Not applicable				Not applicable
Surface Water Treatment Rule Requirements	not applicable	not applicable	not applicable	Not applicable	Not applicable
Monitoring Waiver in effect:		Asbestos/Dioxin			

Note- 10/22/01 inventoried by EPA this date, talked to Ron Sather about monitoring, will meet with him in November to do sanitary survey and clarify monitoring. Meanwhile, told Ron to continue sampling as he has under WADOH to date.
 Note- per Robin Dalton 12/19/01 limited distribution system here does not justify development of full sampling plan. I will include sampling plan with sanitary survey in early 2002.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

January 8, 2003

Reply To
Attn Of: OW-136

Ron Sather
Facilities Manager
7 Cedars Casino
270756 Hwy. 101
Sequim, WA 98382

Dear Mr. Sather:

This letter is an INFORMAL ADVISORY to you on the current monitoring status of your public water system(s) according to EPA's monitoring records. If EPA's records are incorrect, this is your opportunity to help me correct them. If EPA's records show that your system is due for required monitoring, please arrange to have this done in order to avoid formal EPA actions.

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Craig L. Paulsen
Drinking Water Unit (OW-136)
EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Tel: (206) 553-4350
Fax: (206) 553-0165
Email: paulsen.craig@epa.gov

If you are currently under an EPA enforcement action, you must fulfill the requirements of that action in addition to providing me with your routine monitoring results.

Sincerely,

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit

Enclosure: EPA Monitoring Log

WATER SYSTEM: 7 Cedars Casino, EPA ID#105300108

TRIBE: Jamestown SKIallam Tribe

<u>Regulated Contaminant Group</u>	<u>Routine Sampling Schedule</u>	<u>Date of Last Sample</u>	<u>Next Sample Due Date</u>	<u>Violations Recorded</u>	<u>Comments</u>
Coliform Bacteria	Quarterly	10/10/02	11/30/02	8/02 9/02	
Inorganic Chemicals (IOCs, except nitrate)	Not applicable				Not applicable
Nitrate	Annual	10/24/02	10/31/03		
Organic Compounds (VOCs/SOCs)	Not applicable				Not applicable
Lead/Copper (tap)	Not applicable				Not applicable
Radiologicals	Not applicable				Not applicable
Sanitary Survey	every 5 years				
Consumer Confidence Report	Not applicable				Not applicable
Surface Water Treatment Rule Requirements	not applicable	not applicable	not applicable	Not applicable	Not applicable
Monitoring Waiver in effect:		Asbestos/Dioxin			

Note- 10/22/01 inventoried by EPA this date, talked to Ron Sather about monitoring, will meet with him in November to do sanitary survey and clarify monitoring. Meanwhile, told Ron to continue sampling as he has under WADOH to date.

Note- per Robin Dalton 12/19/01 limited distribution system here does not justify development of full sampling plan. I will include sampling plan with sanitary survey in early 2002.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

September 27, 2002

Reply To
Attn Of: OW-136

Ron Sather
Facilities Manager
7 Cedars Casino
270756 Hwy. 101
Sequim, WA 98382

Dear Mr. Sather:

This letter is an INFORMAL ADVISORY to you on the current monitoring status of your public water system(s) according to EPA's monitoring records. If EPA's records are incorrect, this is your opportunity to help me correct them. If EPA's records show that your system is due for required monitoring, please arrange to have this done in order to avoid formal EPA actions.

The Safe Drinking Water Act requires public water systems to monitor and report on regulated drinking water contaminants in their system (40 CFR Part 141). Sample results are due to EPA by the 10th day of the month following the monitoring period (40 CFR Part 141.31). Please mail, fax or email these results to EPA promptly in order to ensure that your monitoring efforts are properly credited to your water system(s). Test results should be sent to:

Craig L. Paulsen
Drinking Water Unit (OW-136)
EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Tel: (206) 553-4350
Fax: (206) 553-0165
Email: paulsen.craig@epa.gov

If you are currently under an EPA enforcement action, you must fulfill the requirements of that action in addition to providing me with your routine monitoring results.

Sincerely,

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit

Enclosure: EPA Monitoring Log

#105300108

Drinking Water Monitoring Log

09/23/02

WATER SYSTEM: 7 Cedars Casino, EPA ID#105300108

TRIBE: Jamestown SKlallam Tribe

<u>Regulated Contaminant Group</u>	<u>Routine Sampling Schedule</u>	<u>Date of Last Sample</u>	<u>Next Sample Due Date</u>	<u>Violations Recorded</u>	<u>Comments</u>
Coliform Bacteria	Quarterly	07/25/02	10/31/02		
Inorganic Chemicals (IOCs, except nitrate)	Not applicable				Not applicable
Nitrate	Annual				
Organic Compounds (VOCs/SOCs)	Not applicable				Not applicable
Lead/Copper (tap)	Not applicable				Not applicable
Radiologicals	Not applicable				Not applicable
Sanitary Survey	every 5 years				
Consumer Confidence Report	Not applicable				Not applicable
Surface Water Treatment Rule Requirements	not applicable	not applicable	not applicable	Not applicable	Not applicable
Monitoring Waiver in effect:		Asbestos/Dioxin			

Note- 10/22/01 inventoried by EPA this date, talked to Ron Sather about monitoring, will meet with him in November to do sanitary survey and clarify monitoring. Meanwhile, told Ron to continue sampling as he has under WADOH to date.

Note- per Robin Dalton 12/19/01 limited distribution system here does not justify development of full sampling plan. I will include sampling plan with sanitary survey in early 2002.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

September 27, 2002

Reply To
Attn Of: OW-136

Vickie Carroll, Water Operator
Jamestown S'Klallam Tribe
3830 W. Sequim Bay Road
Sequim, WA 98382

Dear Ms. Carroll:

This letter is an INFORMAL ADVISORY to you on the current monitoring status of your public water system(s) according to EPA's monitoring records. If EPA's records are incorrect, this is your opportunity to help me correct them. If EPA's records show that your system is due for required monitoring, please arrange to have this done in order to avoid formal EPA actions.

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Craig L. Paulsen
Drinking Water Unit (OW-136)
EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Tel: (206) 553-4350
Fax: (206) 553-0165
Email: paulsen.craig@epa.gov

If you are currently under an EPA enforcement action, you must fulfill the requirements of that action in addition to providing me with your routine monitoring results.

Sincerely,

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit

Enclosure: EPA Monitoring Log

Drinking Water Monitoring Log

09/23/02

WATER SYSTEM: Blyn CWS., EPA #105300083

TRIBE: Jamestown SKlallam

<u>Regulated Contaminant Group</u>	<u>Routine Sampling Schedule</u>	<u>Date of Last Sample</u>	<u>Next Sample Due Date</u>	<u>Violations Recorded</u>	<u>Comments</u>
Coliform Bacteria	monthly	09/04/02	10/31/02	5/3/00 tot col+ (5/18 repeats)	
Inorganic Chemicals (IOCs, except nitrate)	Every 3 years	8/28/02	11/30/02		- initial vulnerability assessment monitoring underway, beginning 8/28/01
Nitrate	Annual	01/16/02	01/31/03		
Organic Compounds (VOCs/SOCs)	Quarterly for one year, then every 3 years	08/28/01 03/01/02 (2 nd qtrly round)	06/30/02		Due- initial vulnerability assessment monitoring underway, beginning 8/28/01
Lead/Copper (tap)	every 3 years	11/08/96 11/0797 (Cu) 2/28/02	2/28/05		
Radiologicals	every 4 years	8/28/01	8/31/05		
Sanitary Survey	every 5 years	07/23/98	07/31/03		
Consumer Confidence Report	Not required	08/20/02	07/01/03		
Surface Water Treatment Rule Requirements	not applicable	Not applicable	not applicable	Not applicable	Not applicable
Monitoring Waiver in effect:		Not applicable			

Note- per Lori de Lorm 12/20/00, water system construction project start delayed until Spring 2001 due to permits. Tribe has sent in all due monitoring results. Will call to reschedule the sanitary survey later in the year 2000.

Note- per Vickie Carrol letter of 10/15/01, new well to be online 10/20/01. Will call to arrange sanitary survey. Initial quarterly monitoring begun 8/28/01 for IOC/VOC/SOCs.

Note- per Vickie Carroll 2/15/02 have done Jan/Feb 02 TCR samples will send results, will do PbCu samples for 5 samples. EPA to call and arrange for sanitary survey date.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: OW-136

Ron Sather
Maintenance Manager
7 Cedars Casino
270756 Hwy. 101
Sequim, WA 98382

JUN 14 2002

Re: Sanitary survey report

Dear Mr. Sather,

Thank you for your support and assistance with the sanitary survey for the 7 Cedars Casino drinking water system on 11 June 2002. Enclosed please find my report for this sanitary survey, as well as a zip disk containing copies of all of the photos that I took at your facility. The purpose of the sanitary survey was to try to identify any deficiencies in this system that might limit your ability to produce safe drinking water for your water users. As we discussed, and in view of the good condition of this water system, the Environmental Protection Agency (EPA) agrees to continue the existing quarterly monitoring schedule for this water system, but adds an annual nitrate water sampling requirement to ensure that your source water is not affected by waste sources indicated by nitrate. EPA agrees to the reduced coliform monitoring requirement on condition that these samples continue to be satisfactory.

Following the sanitary survey, I contacted Clallam County to request a copy of the well log for your primary well. Apparently, the County does not have a well log on file for this well. Because of this lack of documentation regarding the adequacy of protection for your water source from surface influences, EPA will closely monitor the coliform bacteria and nitrate sample results for any indication that increased monitoring or other treatment steps are warranted. If you do find a copy of this well log, please forward a copy to me for review. The information on a well log could be a valuable source of information regarding the safety of your water source.

I am pleased to be able to report that for the most part, this water system is in very good condition and appears to be

well operated and maintained. EPA requests that you address the following items of concern:

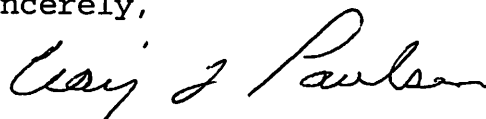
- 1) Screen the drain outlet from the concrete vault housing the well head to ensure that water does not accumulate in this space and that animals cannot enter the vault;
- 2) develop a basic Wellhead Protection Plan, possibly with support from Evergreen Rural Water. I am enclosing a copy of EPA's Small Community Guidance for such plans for your review. In view of the location of your primary well in the casino parking lot, this plan should at least include emergency contact numbers and responses in case you have to deal with spillage or other damage from vehicles over the wellhead, or flooding for the vault with damage to the wellhead.

It is my understanding that the media in the two pressure filters will be replaced within the next few weeks. Please advise me as to 1) when this takes place and 2) what media is used to replace the existing media. Also, please let me know if any work is done on the ozone generator, air dryer or ozone contactor tank. I recognize that this treatment is intended by you for manganese removal, but ozonation can be an effective disinfection treatment as well. The limited coliform monitoring combined with the current lack of a well log, make this disinfection capability an important issue for this water system.

Based upon discussions during the sanitary survey, I understand that the Jamestown S'Klallam Tribe's water operator plans to take the routine coliform and nitrate samples for this water system. Please let me know if this changes.

If you have questions about this survey, or its findings, please call me at (206)-553-4350.

Sincerely,



Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit (OW-136)

Encl:

Cc: Vickie Carroll, Jamestown Tribe
Warren Nilchee, IHS
Ross Peterson, ACR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: OW-136

Ron Sather
Facilities Manager
Seven Cedars Casino
270756 Highway 101
Sequim, WA 98382

APR 16 2002

*4/30/02
reschedule to
2pm 11 June
ok'd by Ron*

Re: Sanitary survey

Dear Ron,

Thanks for your call back today. I will plan to meet you at the Casino about 2pm then on Tuesday June 4 to conduct the sanitary survey with you. For your facility, I doubt this will take more than about an hour. I will enclose here a copy of the form that I will be using (only the drinking water section) for your information. If you like you're free to begin filling in the form ahead of time to save time.

I anticipate meeting with you first to discuss your system and go over this form, filling in as much as we can. Then I'd like to start with your drinking water source and follow your system through any treatment steps and the major parts of your distribution system. I'd like to take GPS readings and some pictures of your drinking water system components. Finally, we can discuss monitoring requirements for your system. The goal of the survey is to try to identify deficiencies that might interfere with the system's ability to deliver safe drinking water. I will take this information back to the office, draft the report for your review and then finalize it. You will receive a copy of every photo or other piece of information taken down for your records.

Please call if you have questions at (206)-553-4350.

Sincerely,

Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit (OW-136)

encl:

#105300108



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: OW-136

OCT 16 2001

Ron Sather
Facilities Manager
Seven Cedars Casino
270756 Hwy. 101
Sequim, WA 98382

Re: Monitoring requirements for casino drinking water system

Dear Mr. Sather:

Please let me introduce myself to you; I am Craig Paulsen and I am the Tribal Drinking Water Coordinator for the Environmental Protection Agency (EPA) for Indian reservations in Idaho, Alaska, Oregon and Washington States. I was informed years ago that the drinking water served by the Casino was supplied by the City of Sequim, but learned recently that the Casino has its own well source and is a stand-alone water system. The Jamestown S'Klallam Tribe forwarded information to me identifying you as the contact for the Casino water system, and that this well water is treated by ozone to serve some 400 persons daily.

This customer base as well as the Casino staff characterize this water system as a federal non-transient non-community or a community drinking water system, depending upon the number of staff. For purposes of monitoring requirements, EPA does not distinguish between the two categories. As a tribally-owned facility, EPA is the appropriate regulatory agency for this water system. I have given this water system the EPA ID#105300108 and have entered it into the national EPA database of federally-regulated drinking water systems. I have consulted with Clallam County and Washington Department of Health on this change.

With the described service population, the Casino water system is currently not in compliance with Safe Drinking Water Act requirements. You should be monitoring and reporting to EPA on the following basis:

total coliform bacteria - monthly
regulated inorganic chemicals (except nitrate) - 3 years

nitrate - annual
regulated VOC/SOC organic compounds - 3 years
lead/copper tap samples - 3 years (minimum five samples)
gross alpha screen (radiological) - 4 years

Tap samples for total coliform and lead/copper samples should be taken from an EPA-approved sampling plan. The intent of the coliform sampling plan is to ensure that all major portions of the distribution system are sampled at least once during each year, while the lead/copper samples are to be taken from the "most at risk" sample taps. I am enclosing copies of example sampling plans that you might use as a model. When you complete your sampling plans, please forward them to me for approval.

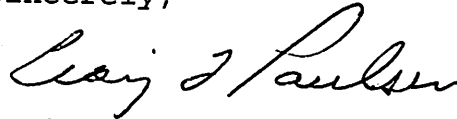
If you need help with these plans, or any other sampling requirements, please let me know. EPA and the Indian Health Service cosponsor a comprehensive technical assistance program that is provided at no charge to EPA-regulated water systems, including onsite circuit rider assistance and training courses.

I also need to arrange with you a site visit to conduct a sanitary survey- a "health checkup" if you will to try to identify any deficiencies that might interfere with the ability of this water system to produce safe drinking water. If your casino facility includes a child-care facility you will also need to complete annual Consumer Confidence Reports, or water quality reports on what constituents are found in your drinking water, for the use of your water users. I can help you with this requirement as well, if it is required and you wish assistance. Since I plan to do a sanitary survey soon for the Tribe's Admin Center water system, we might try to conduct both on the same day. This might allow us to discuss these requirements further if you have questions.

Please review the enclosed example sampling plans and prepare and send your plans to me. Please forward copies of your latest round of test results for these regulated drinking water contaminants, or arrange to have them tested. Also, please let me know if the casino provides any sort of day-care facilities for children of your customers. I prefer to work cooperatively and informally with the tribes and their facilities as long as they are responsive to EPA's communications and regulatory requirements. The Jamestown S'Klallam Tribe is an excellent public health protection partner and I look forward to working with you as well. Please call me at (206)-553-4350 if you have

any questions regarding this letter. I am also enclosing my business card for contact information.

Sincerely,



Craig L. Paulsen
Tribal Drinking Water Coordinator
Drinking Water Unit (OW-136)

encl:

cc: Vickie Carroll, Jamestown Tribe
Lyn Muench, Jamestown Tribe
John Spriggs, IHS
Brad Brooks, WADOH
Dean Butz, Clallam County



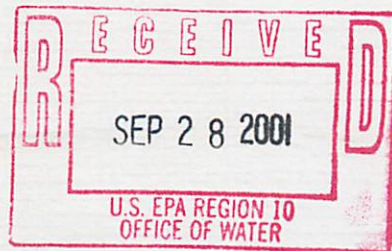
JAMESTOWN S'KLALLAM TRIBE

1033 Old Blyn Highway, Sequim, WA 98382

360/683-1109

FAX 360/681-4643

September 25, 2001



Mr. Craig L. Paulsen
Drinking Water Unit (OW-136)
EPA Region 10
1200 Sixth Ave.
Seattle, WA 98101

Dear Mr. Paulsen:

I spoke with Ron Sather today regarding Seven Cedars Casino. Here are the answers to your questions:

1. Contact: Ron Sather
7 Cedars Casino
270756 Hwy 101
Sequim, WA 98382
Phone: 360 681-6734
2. Water Source: well
3. Water Treatment: ozone
4. Average Number of persons served each day: 400
5. Number of service connections: 1 (although there are 2 restrooms up on the hill, in one of the buildings)

Regarding the monitoring, at the present time I take the total coliform bacteria quarterly and Ron and I would like to continue this on the quarterly basis, due to cost and we have had no problems. I have the results sent directly to Ron, so I will ask him to forward results to you or possibly fax to me and I will forward a copy. The casino has been in operation for a little over six years and I have just been working with them for about one year, so I do not know if they have taken any of the other monitoring samples. If you would like to talk with him regarding this, you may call him at the above telephone number.

Please call me if you have any further questions.

Sincerely,

Vickie L. Carroll

